

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA,
v.
EDWARD WALSH VAUGHAN (1)
HADI AKKAD (2)

Case No. 4:22-cr-00162-ALM-BD

DEFENDANTS' RENEWAL OF PROFFERS

During the first trial, defendants Vaughan and Akkad made a series of proffers of evidence excluded under the Court's rulings. Those rulings are unchanged in the second trial. Defendants therefore renew the proffers of evidence set forth in Docs. 376 (Defendants' First Written Offer of Proof), 393 (Defendants' Supplement to First Written Offer of Proof), 395 (Defendants' Offer of Proof--Defense Exhibit 598), and 396 (Defendants' Second Written Offer of Proof). In addition, defendants renew their proffer of the Bateman memorandum. Doc. 335.

Dated: May 21, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify this document was electronically filed on May 21, 2025, and all counsel was electronically served via this Court's Electronic Filing System on the day of filing.

/s/ John D. Cline

John D. Cline